

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)	
DECEMBER 2018	000754
E-Filed Number: 1812012602	

PLAINTIFF'S NAME
NIKOLIN KUTROLI

DEFENDANT'S NAME
DEWAYNE LOGAN

PLAINTIFF'S ADDRESS
612 LOWELL STREET
PEABODY MA 01960

DEFENDANT'S ADDRESS
1074 SEDAN CRABTREE ROAD #A
LUCASVILLE OH 45658

PLAINTIFF'S NAME
GARIP KUTROLI

DEFENDANT'S NAME
OMAR VANCE

PLAINTIFF'S ADDRESS
25 WHIPPOORWILL ROAD
OLD LYME CT 06371

DEFENDANT'S ADDRESS
99 N. MAIN STREET
PEEBLES OH 45660

PLAINTIFF'S NAME
VALENTINA KUTROLI

DEFENDANT'S NAME
NANCY VANCE

PLAINTIFF'S ADDRESS
25 WHIPPOORWILL ROAD
OLD LYME CT 06371

DEFENDANT'S ADDRESS
1645 LOUISVILLE ROAD
SEAMAN OH 45679

TOTAL NUMBER OF PLAINTIFFS

3

TOTAL NUMBER OF DEFENDANTS

5

COMMENCEMENT OF ACTION

☒ Complaint

☐ Petition Action

☐ Notice of Appeal

☒ Writ of Summons

☐ Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less

☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration

☒ Jury

☐ Non-Jury

☐ Other:

☐ Miss Tort

☒ Savings Action

☐ Petition

☐ Commerce

☐ Minor Court Appeal

☐ Statutory Appeals

☐ Settlement

☐ Minors

☐ W/D/Survival

CASE TYPE AND CODE

2V - MOTOR VEHICLE ACCIDENT

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PRO PROTHY**

IS CASE SUBJECT TO
COORDINATION ORDER?

YES

NO

DEC 06 2018

M. BRYANT

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: NIKOLIN KUTROLI , GARIP KUTROLI ,
VALENTINA KUTROLI

Papers may be served at the address set forth below.

NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY

JOHN M. DODIG

ADDRESS

1845 WALNUT STREET

21ST FLOOR

PHILADELPHIA PA 19103

PHONE NUMBER

(215) 567-8300

FAX NUMBER

(215) 567-8333

SUPREME COURT IDENTIFICATION NO.

51092

E-MAIL ADDRESS

jdodig@feldmanshepherd.com

SIGNATURE OF FILING ATTORNEY OR PARTY

JOHN DODIG

DATE SUBMITTED

Thursday, December 06, 2018, 02:49 pm

FINAL COPY (Approved by the Prothonotary Clerk)



COMPLETE LIST OF DEFENDANTS:

1. DEWAYNE LOGAN
1074 SEDAN CRABTREE ROAD #A
LUCASVILLE OH 45658
2. OMAR VANCE
99 N. MAIN STREET
PEEBLES OH 45660
3. NANCY VANCE
1645 LOUISVILLE ROAD
SEAMAN OH 45679
4. VICTORY LANE EXPRESS LLC
131 3RD STREET
PEEBLES OH 45660
5. OTS TRUCKING, LLC
1645 LOUISVILLE ROAD
SEAMAN OH 45679

Attorneys for Plaintiff(s)

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY

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NOTICE TO PLEAD

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defense or objections to the claim set forth against you.

You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE
ONE READING CENTER
PHILADELPHIA, PA 19107
(215) 238-1701

AVISO

Le han demandado a usted en la corte. Si desea defenderse contra las quejas presentadas, es absolutamente necesario que usted responda dentro de 20 días después de ser servido con esta demanda y aviso. Para defendérselo es necesario que usted, o su abogado, registre con la corte en forma escrita, el punto de vista de usted y cualquier objeción contra las quejas en esta demanda.

Recuerde: Si usted no responde a esta demanda, se puede proseguir con el proceso sin su participación. Entonces, la corte puede, sin notificación decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Por razón de esa decisión, es posible que usted pueda perder dinero, propiedad o otros derechos importantes.

¡LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
ONE READING CENTER
1101 MARKET STREET
PHILADELPHIA, PA 19107
(215) 238-1701

COMPLAINT - CIVIL ACTION

1. Plaintiff, Nikolin Kutrolli, is an adult individual who resides at 612 Lowell Street, Peabody, Massachusetts 01960.
2. Plaintiff, Garip Kutrolli, is an adult individual who resides at 25 Whippoorwill Road, Old Lyme, Connecticut 06371.
3. Plaintiff, Valentina Kutrolli, is an adult individual who resides at 25 Whippoorwill Road, Old Lyme, Connecticut 06371.
4. Defendant, Dewayne Logan, is an adult individual who resides at 1074 Sedan Crabtree Road, #A, Lucasville, Ohio 45658.
5. Defendant, Omar Vance, is an adult individual who resides at 99 N. Main Street, Peebles, Ohio 45660 and also a business address of 1645 Louisville Road, Seaman, Ohio 45679.
6. Defendant, Nancy Vance, is an adult individual with a business address of 1645 Louisville Road, Seaman, Ohio 45679.
7. Defendant, Victory Lane Express LLC, is a corporation and/or business entity with a place of business located at 131 3rd Street, Peebles, Ohio 45660.
8. Defendant, OTS Trucking, LLC, is a corporation and/or business entity with a place of business located at 1645 Louisville Road, Seaman, Ohio 45679.
9. At all times relevant hereto, Defendant, Dewayne Logan, was an employee and actual or apparent agent of the Defendants, Omar Vance, Nancy Vance, Victory

Lane Express LLC and/or OTS Trucking, LLC, and was acting in the course and scope of his employment and agency with the Defendants, Omar Vance, Nancy Vance, Victory Lane Express LLC and/or OTS Trucking, LLC.

10. At all relevant times, Defendants, Victory Lane Express LLC and OTS Trucking, LLC, regularly conducted and continues to regularly conduct business in the Commonwealth of Pennsylvania and Philadelphia County, Pennsylvania.

11. On December 17, 2016, at approximately 8:20 a.m., Plaintiff, Nikolin Kutrolli, was the operator of a motor vehicle, with Plaintiffs, Garip and Valentina Kutrolli being passengers in said vehicle, traveling on I-70 in Sewickley Township, Westmoreland County, Pennsylvania when Plaintiffs' vehicle was struck by the vehicle being operated by the Defendant, Dewayne Logan, and owned by the Defendants, Omar Vance, Nancy Vance, Victory Lane Express LLC and/or OTS Trucking, LLC, causing Plaintiffs to sustain serious and permanent personal injuries more specifically set forth below.

12. At the time of the accident, Defendant, Dewayne Logan, was employed by the Defendants, Omar Vance, Nancy Vance, Victory Lane Express LLC and/or OTS Trucking, LLC. Upon information and belief, Defendant, Dewayne Logan, was acting in the course and scope of his employment at the time of the accident.

13. The accident as aforesaid was caused by the negligence of the Defendants and was in no manner whatsoever due to any act or failure to act on the part of the Plaintiffs.

14. The carelessness, recklessness and negligence of the Defendants included the following:

- a. Operating the said motor vehicle at a high and excessive rate of speed under the circumstances;
- b. Failure to keep a proper lookout ahead;
- c. Failure to have said motor vehicle under such control as to be able to stop within the assured clear distance ahead;
- d. Failure to make proper observations of traffic upon the roadway;
- e. Failure to properly use the brakes;
- f. Being otherwise negligent under the circumstances;
- g. Operating a motor vehicle in careless disregard for the safety of persons or property in violation of 75 Pa.C.S.A. §3714;
- h. Careless and reckless driving;
- i. Failure to slow and stop for slowing traffic ahead;
- j. Failure to be aware of and properly react to roadway and traffic conditions, including an accident ahead and icy road conditions;
- k. Failure to control Defendant's commercial vehicle under the existing circumstances, including the weather and icy road conditions;
- l. Failure to comply with the motor vehicle and commercial motor vehicle code, law, and regulations of the Commonwealth of Pennsylvania;
- m. Failure to comply with Federal code, law, and regulations, including the Motor Carrier Safety Administration regulations;
- n. Failure to comply with industry standards;
- o. Failure to properly hire, train, retain, supervise and monitor Defendant's driver, Dewayne Logan;
- p. Failure to create, implement, and enforce appropriate policies and procedures concerning the inspection, maintenance, and operation of a commercial motor vehicle;

- q. Failure to comply with company policies and procedures concerning the inspection, maintenance and operation of a commercial motor vehicle; and
- r. Failure to properly inspect and maintain the commercial motor vehicle.

COUNT I
NIKOLIN KUTROLI V. DEFENDANTS

15. Plaintiff incorporates by reference paragraphs 1 through 14 as though same were fully set forth herein at length.

16. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff, Nikolin Kutrolli, sustained severe and permanent injuries that include, but are not limited to: axial lower back pain and left L5 and/or S1 radiculopathy and myofascial pain, as well as damage to his nerves and nervous system.

17. All of the aforesaid injuries are permanent and have imposed a serious impairment of a body function upon the Plaintiff and have caused, and in the future will cause the Plaintiff great pain and suffering and a serious impairment of a bodily function.

18. As a further result of this accident and by reason of the injuries sustained, Plaintiff has in the past been obligated to receive and undergo medical attention and care and to expend various sums of money and/or incur various expenses for the injuries he has suffered, and he may in the future continue to be obliged to expend such sums or to incur such expenses.

19. As a further result of this accident and by reason of the injuries suffered, Plaintiff has in the past suffered and may in the future continue to suffer great pain, agony, mental anguish, embarrassment and humiliation, and has in the past been hindered and

may in the future continue to be hindered from attending to his daily duties, functions and occupation, to his great detriment and loss.

20. As a further direct and proximate result of the negligence of the Defendants, Plaintiff has suffered injuries which have caused him physical and mental impairment, preventing him from performing all or substantially all of the material acts and duties which constitute his usual and customary daily activities, constituting a loss of the enjoyment of the ordinary pleasures of life.

21. As a further result of this accident and by reason of the injuries sustained, Plaintiff has sustained an impairment of his earning capacity and power.

22. The negligence of the Defendants as stated herein was the proximate cause or a substantial factor in causing the injuries and damages sustained by the Plaintiff.

WHEREFORE, Plaintiff, Nikolin Kutrolli, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

COUNT II
GARIP KUTROLI V. DEFENDANTS

23. Plaintiff incorporates by reference paragraphs 1 through 22 as though same were fully set forth herein at length.

24. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff, Garip Kutrolli, sustained severe and permanent injuries that include, but are not limited to: right shoulder rotator cuff tear, L5-S1 disk herniation with left S1 nerve root impingement, mild right lateral disk herniation at L4-L5, mild left lateral disk

herniation at L3-L4, leg, neck and arm pain, as well as damage to his nerves and nervous system.

25. All of the aforesaid injuries are permanent and have imposed a serious impairment of a body function upon the Plaintiff and have caused, and in the future will cause the Plaintiff great pain and suffering and a serious impairment of a bodily function.

26. As a further result of this accident and by reason of the injuries sustained, Plaintiff has in the past been obligated to receive and undergo medical attention and care and to expend various sums of money and/or incur various expenses for the injuries he has suffered, and he may in the future continue to be obliged to expend such sums or to incur such expenses.

27. As a further result of this accident and by reason of the injuries suffered, Plaintiff has in the past suffered and may in the future continue to suffer great pain, agony, mental anguish, embarrassment and humiliation, and has in the past been hindered and may in the future continue to be hindered from attending to his daily duties, functions and occupation, to his great detriment and loss.

28. As a further direct and proximate result of the negligence of the Defendants, Plaintiff has suffered injuries which have caused him physical and mental impairment, preventing him from performing all or substantially all of the material acts and duties which constitute his usual and customary daily activities, constituting a loss of the enjoyment of the ordinary pleasures of life.

29. As a further result of this accident and by reason of the injuries sustained, Plaintiff has sustained an impairment of his earning capacity and power.

30. The negligence of the Defendants as stated herein was the proximate cause or a substantial factor in causing the injuries and damages sustained by the Plaintiff.

WHEREFORE, Plaintiff, Garip Kutrolli, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

COUNT III
VALENTINA KUTROLLI V. DEFENDANTS

31. Plaintiff incorporates by reference paragraphs 1 through 30 as though same were fully set forth herein at length.

32. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff, Valentina Kutrolli, sustained severe and permanent injuries that include, but are not limited to: multilevel disk desiccation, cervical radiculopathy, lumbar radiculopathy, low back pain, pain in arms and knees, as well as damage to her nerves and nervous system.

33. All of the aforesaid injuries are permanent and have imposed a serious impairment of a body function upon the Plaintiff and have caused, and in the future will cause the Plaintiff great pain and suffering and a serious impairment of a bodily function.

34. As a further result of this accident and by reason of the injuries sustained, Plaintiff has in the past been obligated to receive and undergo medical attention and care and to expend various sums of money and/or incur various expenses for the injuries she has suffered, and she may in the future continue to be obliged to expend such sums or to incur such expenses.

35. As a further result of this accident and by reason of the injuries suffered, Plaintiff has in the past suffered and may in the future continue to suffer great pain, agony, mental anguish, embarrassment and humiliation, and has in the past been hindered and may in the future continue to be hindered from attending to her daily duties, functions and occupation, to her great detriment and loss.

36. As a further direct and proximate result of the negligence of the Defendants, Plaintiff has suffered injuries which have caused him physical and mental impairment, preventing her from performing all or substantially all of the material acts and duties which constitute her usual and customary daily activities, constituting a loss of the enjoyment of the ordinary pleasures of life.

37. As a further result of this accident and by reason of the injuries sustained, Plaintiff has sustained an impairment of her earning capacity and power.

38. The negligence of the Defendants as stated herein was the proximate cause or a substantial factor in causing the injuries and damages sustained by the Plaintiff.

WHEREFORE, Plaintiff, Valentina Kutrolli, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

COUNT IV
GARIP KUTROLLI V. DEFENDANTS

39. Plaintiff incorporates by reference paragraphs 1 through 38 as though same were fully set forth herein at length.

40. Plaintiff, Garip Kutrolli, is the husband of Plaintiff, Valentina Kutrolli.

41. As a result of Defendants' negligence and carelessness, as set forth above, Plaintiff, Garip Kutrolli, has been deprived of his wife's consortium, care, services, comfort, society, affection and support.

WHEREFORE, Plaintiff, Garip Kutrolli, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

COUNT V
VALENTINA KUTROLLI V. DEFENDANTS

42. Plaintiff incorporates by reference paragraphs 1 through 41 as though same were fully set forth herein at length.

43. Plaintiff, Valentina Kutrolli, is the wife of Plaintiff, Garip Kutrolli.

44. As a result of Defendants' negligence and carelessness, as set forth above, Plaintiff, Valentina Kutrolli, has been deprived of her husband's consortium, care, services, comfort, society, affection and support.

WHEREFORE, Plaintiff, Valentina Kutrolli, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

Feldman, Shepherd, Wohlgeleuter,
Tanner, Weinstock & Dodig

By: _____

JOHN M. DODIG, ESQUIRE
JASON A. DARIA, ESQUIRE
Attorneys for Plaintiffs

VERIFICATION

I, Nikolin Kutrolli, hereby state that I am one of the Plaintiffs in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Nikolin Kutrolli', written over a horizontal line.

Nikolin Kutrolli

Date: 11/19/2018

VERIFICATION

I, Valentina Kutrolli, hereby state that I am one of the Plaintiffs in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Valentina Kutrolli
Valentina Kutrolli

Date: 11-19-2018

VERIFICATION

I, Garip Kutrolli, hereby state that I am one of the Plaintiffs in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Garip Kutrolli
Garip Kutrolli

Date: 11-19-2018

Filed and Attested by the
Office of Judicial Records
12 DEC 2018 02:37 pm

G. IMPERATO

PION, NERONE, GIRMAN, WINSLOW
& SMITH, P.C.

James DeCinti, Esquire

jdecinti@pionlaw.com

Pa. I.D. No. 77421

John T. Pion, Esquire

jpion@pionlaw.com

Pa. I.D. No. 43675

Andrew D. Webster, Esquire

awebster@pionlaw.com

Pa. I.D. No. 308337

1500 One Gateway Center

420 Fort Duquesne Boulevard

Pittsburgh, PA 15222

(412) 281-2288

Attorneys for Defendants

NIKOLIN KUTROLI, GARIP KUTROLI,
AND VALENTINA KUTROLI,

Plaintiffs,

vs.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS, LLC AND OTS TRUCKING, LLC

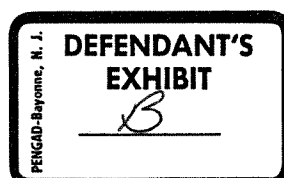
Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

CIVIL DIVISION

Term 2018

Case ID: 181200754



Case ID: 181200754

IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY, PENNSYLVANIA
CIVIL DIVISION

NIKOLIN KUTROLI, GARIP KUTROLI,
AND VALENTINA KUTROLI,

Plaintiffs,

TERM 2018

vs.

Case ID: 181200754

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS, LLC AND OTS TRUCKING, LLC

Defendants.

PRAECIPE FOR APPEARANCE

Kindly enter the Appearance of James DeCinti, Esquire, John T. Pion, Esquire, Andrew D. Webster, Esquire and Pion, Nerone, Gorman, Winslow & Smith, P.C. on behalf of Defendants Dewayne Logan, Omar Vance, Nancy Vance, Victory Lane Express, LLC and OTS Trucking, LLC regarding the above-captioned matter.

Respectfully submitted,

PION, NERONE, GORMAN, WINSLOW
& SMITH, P.C.

By: 

James DeCinti, Esquire

jdecinti@pionlaw.com

John T. Pion, Esquire

jpion@pionlaw.com

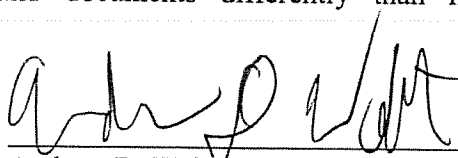
Andrew D. Webster, Esquire

awebster@pionlaw.com

One Gateway Center – Suite 1500
420 Ft. Duquesne Boulevard
Pittsburgh, PA 15222
(412) 281-2288
Attorneys for Defendants

ATTORNEY CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



Andrew D. Webster

DATED: 12/12/18

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing Entry for Appearance
was served upon counsel this 12th day of December, via email, as follows:

John M. Dodig, Esquire
jdodig@feldmanshepherd.com
Feldman Shepherd Wohlgeleinter Tanner Weinstock Dodig, LLP
1845 Walnut Street – 21st Floor
Philadelphia, PA 19103
(Counsel for Plaintiffs)

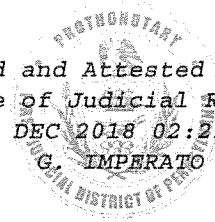
PION, NERONE, GIRMAN, WINSLOW
& SMITH, P.C.

By: 

Andrew D. Webster, Esquire
Pa. I.D. No. 308337

Feldman, Shepherd, Wohlgelernter
Tanner, Weinstock & Dodig
By: John M. Dodig, Esquire/Jason A. Daria, Esquire
I.D. No. 51092/73360
1845 Walnut Street
21st Floor
Philadelphia, PA 19103
(215) 567-8300

Filed and Attested by the
Office of Judicial Records
13 DEC 2018 02:25 pm



Attorneys for Plaintiff(s)

NIKOLIN KUTROLI,
GARIP KUTROLI AND
VALENTINA KUTROLI

v.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS LLC AND OTIS TRUCKING, LLC

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:

: DECEMBER TERM, 2018
:

: NO. 000754
:

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS

JOHN M. DODIG, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for the Plaintiffs in the above-captioned matter, and that on December 10, 2018, a true and correct copy of the Civil Action Complaint filed in the above matter was served on the Defendant, Dewayne Logan, by Certified Mail. A copy of the Return Receipt Card and the USPS Tracking Confirmation are attached hereto as

Exhibit "A".

FELDMAN, SHEPHERD, WOHLEGERLTER
TANNER, WEINSTOCK & DODIG

BY: 

JOHN M. DODIG, ESQUIRE

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 13th DAY :

OF December , 2018. :


NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Christine M. Agster, Notary Public
Philadelphia County
My commission expires June 27, 2022
Commission number 1225107
Member, Pennsylvania Association of Notaries

EXHIBIT “A”

FELDMAN
SHEPHERD
WOHLGELERNTER
TANNER
WEINSTOCK
DODIG LLP

John M. Dodig
Shareholder
Telephone: 215.567.8300
Direct Fax: 215.599.1318
jdodig@feldmanshepherd.com
Also Member of NJ Bar
LL.M In Trial Advocacy; Certified By The
Supreme Court Of New Jersey As A Civil Trial
Attorney

December 7, 2018

Mr. Dewayne Logan
1074 Sedan Crabtree Road
#A
Lucasville, OH 45648

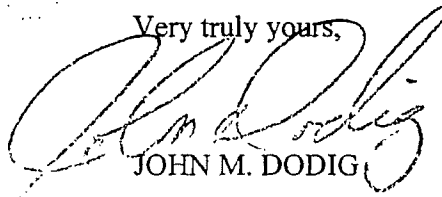
**RE: Nikolin Kutrolli, et al v. Dewayne Logan, et al
Court of Common Pleas, Philadelphia County
December Term, 2018 – No. 000754**

Dear Mr. Logan:

Enclosed please find the Civil Action Complaint with regard to the above matter. Please note you have twenty (20) days in which to file an Answer and/or Entry of Appearance or a judgment in default may be filed against you.

I suggest that you forward this to your insurance carrier, or attorney if you do not have an insurance carrier, so that your interests may be protected in this matter.

Very truly yours,



JOHN M. DODIG

JMD/kv

SENT VIA CERTIFIED MAIL

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70180680000085337310

Remove X

Expected Delivery on

MONDAY

10 DECEMBER 2018 ⓘ **by 8:00pm** ⓘ

 **Delivered**

December 10, 2018 at 2:31 pm
Delivered, Left with Individual
LUCASVILLE, OH 45648

Get Updates ▼

Text & Email Updates



Tracking History



Product Information

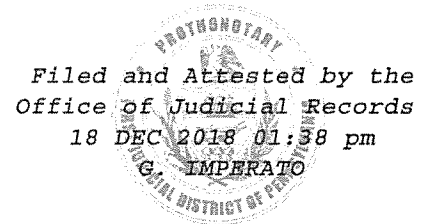


See Less ^

Feedback

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or</p> <p>1. <u>A</u></p> <p>Mr. Dewayne Logan 1074 Sedan Crabtree Road #A Lucasville, OH 45648</p>		<p>A. Signature X</p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
		B. Received by (Printed Name)	C. Date of Delivery
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0000 8533 7310</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053		Domestic Return Receipt	

Feldman, Shepherd, Wohlgelernter
Tanner, Weinstock & Dodig
By: John M. Dodig, Esquire/Jason A. Daria, Esquire
I.D. No. 51092/73360
1845 Walnut Street
21st Floor
Philadelphia, PA 19103
(215) 567-8300



Attorneys for Plaintiff(s)

NIKOLIN KUTROLI,
GARIP KUTROLI AND
VALENTINA KUTROLI

v.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS LLC AND OTIS TRUCKING, LLC

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:

: DECEMBER TERM, 2018
:

: NO. 000754
:

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS

JOHN M. DODIG, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for the Plaintiffs in the above-captioned matter, and that on December 11, 2018, a true and correct copy of the Civil Action Complaint filed in the above matter was served on the Defendant, OTS Trucking, LLC, by Certified Mail. A copy of the Return Receipt Card and the USPS Tracking Confirmation are attached

hereto as Exhibit "A".

FELDMAN, SHEPHERD, WOHLGELERNTER
TANNER, WEINSTOCK & DODIG

BY: 

JOHN M. DODIG, ESQUIRE

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 18th DAY :

OF December , 2018. :


NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Christine M. Agster, Notary Public
Philadelphia County
My commission expires June 27, 2022
Commission number 1225107
Member, Pennsylvania Association of Notaries

EXHIBIT “A”

FELDMAN
SHEPHERD
WOHLGELERNTER
TANNER
WEINSTOCK
DODIG LLP

John M. Dodig
Shareholder
Telephone: 215.567.8300
Direct Fax: 215.599.1318
jdodig@feldmanshepherd.com
Also Member of NJ Bar
LL.M In Trial Advocacy; Certified By The
Supreme Court Of New Jersey As A Civil Trial
Attorney

December 7, 2018

OTS Trucking, LLC
1645 Louisville Road
Seaman, OH 45679

**RE: Nikolin Kutrolli, et al v. Dewayne Logan, et al
Court of Common Pleas, Philadelphia County
December Term, 2018 – No. 000754**

Gentlemen:

Enclosed please find the Civil Action Complaint with regard to the above matter. Please note you have twenty (20) days in which to file an Answer and/or Entry of Appearance or a judgment in default may be filed against you.

I suggest that you forward this to your insurance carrier, or attorney if you do not have an insurance carrier, so that your interests may be protected in this matter.

Very truly yours,

JOHN M. DODIG

JMD/kv

SENT VIA CERTIFIED MAIL

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. A

OTS Trucking, LLC
1645 Louisville Road
Seaman, OH 45679



9590 9402 3975 8079 5930 76

2. *Article Number (Transfer from service label)

7018 0680 0000 8533 7303

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |

Restricted Delivery

Domestic Return Receipt

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70180680000085337303

Remove X

Your item was delivered at 8:56 am on December 11, 2018 in SEAMAN, OH 45679.

✓ Delivered

December 11, 2018 at 8:56 am
Delivered
SEAMAN, OH 45679

Get Updates ∨

Feedback

Text & Email Updates



Tracking History



Product Information



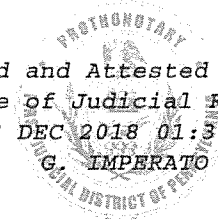
See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

Feldman, Shepherd, Wohlgelernter
Tanner, Weinstock & Dodig
By: John M. Dodig, Esquire/Jason A. Daria, Esquire
I.D. No. 51092/73360
1845 Walnut Street
21st Floor
Philadelphia, PA 19103
(215) 567-8300

Filed and Attested by the
Office of Judicial Records
18 DEC 2018 01:36 pm



Attorneys for Plaintiff(s)

NIKOLIN KUTROLI,
GARIP KUTROLI AND
VALENTINA KUTROLI

v.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS LLC AND OTIS TRUCKING, LLC

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:
:
: DECEMBER TERM, 2018
:
: NO. 000754
:

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS

JOHN M. DODIG, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for the Plaintiffs in the above-captioned matter, and that on December 11, 2018, a true and correct copy of the Civil Action Complaint filed in the above matter was served on the Defendant, Nancy Vance, by Certified Mail. A copy of the Return Receipt Card and the USPS Tracking Confirmation are attached hereto as

Exhibit "A".

FELDMAN, SHEPHERD, WOHLGELERNTER
TANNER, WEINSTOCK & DODIG

BY: _____

JOHN M. DODIG, ESQUIRE

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 18th DAY :

OF December , 2018. :



NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Christine M. Agster, Notary Public
Philadelphia County
My commission expires June 27, 2022
Commission number 1225107
Member, Pennsylvania Association of Notaries

EXHIBIT “A”

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TANNER
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jdodig@feldmanshepherd.com
Also Member of NJ Bar
LL.M In Trial Advocacy; Certified By The
Supreme Court Of New Jersey As A Civil Trial
Attorney

December 7, 2018

Ms. Nancy Vance
1645 Louisville Road
Seaman, OH 45679

**RE: Nikolin Kutrolli, et al v. Dewayne Logan, et al
Court of Common Pleas, Philadelphia County
December Term, 2018 – No. 000754**

Dear Ms. Vance:

Enclosed please find the Civil Action Complaint with regard to the above matter. Please note you have twenty (20) days in which to file an Answer and/or Entry of Appearance or a judgment in default may be filed against you.

I suggest that you forward this to your insurance carrier, or attorney if you do not have an insurance carrier, so that your interests may be protected in this matter.

Very truly yours,

JOHN M. DODIG

JMD/kv

SENT VIA CERTIFIED MAIL

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Complete Items 1, 2, and 3.</p> <p>Print your name and address on the reverse so that we can return the card to you.</p> <p>Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>Mar Vance</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Ms. Nancy Vance 1645 Louisville Road Seaman, OH 45679</p>		<p>B. Received by (Printed Name) <i>Mar Vance</i> C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label) 9590 9402 3975 8079 5930 90</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input checked="" type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Restricted Delivery</p>			
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70180680000085337334

Remove ✕

Your item was delivered at 8:56 am on December 11, 2018 in SEAMAN, OH 45679.

✓ Delivered

December 11, 2018 at 8:56 am

Delivered

SEAMAN, OH 45679

Get Updates ✓

Feedback

Text & Email Updates



Tracking History



Product Information



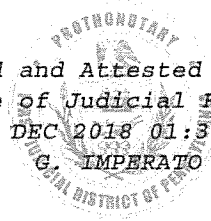
See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

Feldman, Shepherd, Wohlgelernter
Tanner, Weinstock & Dodig
By: John M. Dodig, Esquire/Jason A. Daria, Esquire
I.D. No. 51092/73360
1845 Walnut Street
21st Floor
Philadelphia, PA 19103
(215) 567-8300

Filed and Attested by the
Office of Judicial Records
18 DEC 2018 01:35 pm



Attorneys for Plaintiff(s)

NIKOLIN KUTROLI,
GARIP KUTROLI AND
VALENTINA KUTROLI

v.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS LLC AND OTIS TRUCKING, LLC

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:
:
: DECEMBER TERM, 2018
:
: NO. 000754
:

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS

JOHN M. DODIG, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for the Plaintiffs in the above-captioned matter, and that on December 11, 2018, a true and correct copy of the Civil Action Complaint filed in the above matter was served on the Defendant, Victory Lane Express LLC, by Certified Mail.

A copy of the Return Receipt Card is attached hereto as Exhibit "A".

FELDMAN, SHERHERD, WOHLGELERNTER
TANNER, WEINSTOCK & DODIG

BY: 

JOHN M. DODIG, ESQUIRE

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 18th DAY :

OF December , 2018. :



NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Christine M. Agster, Notary Public
Philadelphia County
My commission expires June 27, 2022
Commission number 1225107
Member, Pennsylvania Association of Notaries

EXHIBIT “A”

FELDMAN
SHEPHERD
WOHLGELERNTER
TANNER
WEINSTOCK
DODIG LLP

John M. Dodig
Shareholder
Telephone: 215.567.8300
Direct Fax: 215.599.1318
jdodig@feldmanshepherd.com
Also Member of NJ Bar
LL.M In Trial Advocacy; Certified By The
Supreme Court Of New Jersey As A Civil Trial
Attorney

December 7, 2018

Victory Lane Express LLC
131 3rd Street
Peebles, OH 45660

RE: Nikolin Kutrolli, et al v. Dewayne Logan, et al
Court of Common Pleas, Philadelphia County
December Term, 2018 – No. 000754

Gentlemen:

Enclosed please find the Civil Action Complaint with regard to the above matter. Please note you have twenty (20) days in which to file an Answer and/or Entry of Appearance or a judgment in default may be filed against you.

I suggest that you forward this to your insurance carrier, or attorney if you do not have an insurance carrier, so that your interests may be protected in this matter.

Very truly yours,

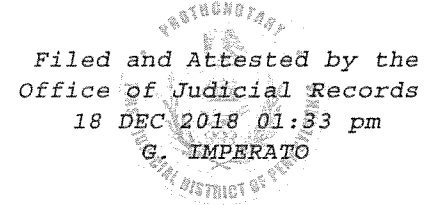
JOHN M. DODIG

JMD/kv

SENT VIA CERTIFIED MAIL

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY			
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Agent</p>			
<p>Victory Lane Express LLC 131 3rd Street Peebles, OH 45660</p>		<p>B. Received by (Printed Name) DANIEL J. VANCE</p> <p>C. Date of Delivery 12-14-18</p>			
<p>9590 9402 3975 8079 5930 83</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>			
<p>2. Article Number (Transfer from service label) 7018 0680 0000 8533 7327</p>		<p>3. Service Type</p> <table border="0"> <tr> <td> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery </td> <td> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </td> </tr> </table>		<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery				
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>			

Feldman, Shepherd, Wohlgelernter
Tanner, Weinstock & Dodig
By: John M. Dodig, Esquire/Jason A. Daria, Esquire
I.D. No. 51092/73360
1845 Walnut Street
21st Floor
Philadelphia, PA 19103
(215) 567-8300



Attorneys for Plaintiff(s)

NIKOLIN KUTROLI,
GARIP KUTROLI AND
VALENTINA KUTROLI

v.

DEWAYNE LOGAN, OMAR VANCE,
NANCY VANCE, VICTORY LANE
EXPRESS LLC AND OTIS TRUCKING, LLC

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:
:
: DECEMBER TERM, 2018
:
: NO. 000754
:

AFFIDAVIT OF SERVICE

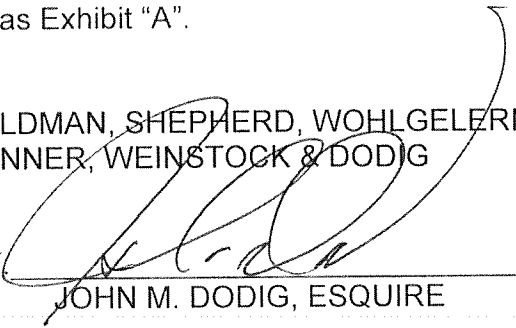
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS

JOHN M. DODIG, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for the Plaintiffs in the above-captioned matter, and that on December 11, 2018, a true and correct copy of the Civil Action Complaint filed in the above matter was served on the Defendant, Omar Vance, by Certified Mail. A copy of

the Return Receipt Card is attached hereto as Exhibit "A".

FELDMAN, SHEPHERD, WOHLGELERNTER
TANNER, WEINSTOCK & DODIG

BY


JOHN M. DODIG, ESQUIRE

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 18th DAY :

OF December , 2018. :


NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Christine M. Agster, Notary Public
Philadelphia County
My commission expires June 27, 2022
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SHEPHERD
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WEINSTOCK
DODIG LLP

John M. Dodig
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jdodig@feldmanshepherd.com
Also Member of NJ Bar
LL.M In Trial Advocacy; Certified By The
Supreme Court Of New Jersey As A Civil Trial
Attorney

December 7, 2018

Mr. Omar Vance
99 N. Main Street
Peebles, OH 45660

RE: Nikolin Kutrolli, et al v. Dewayne Logan, et al
Court of Common Pleas, Philadelphia County
December Term, 2018 – No. 000754

Dear Mr. Vance:

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Very truly yours,

JOHN M. DODIG

JMD/kv

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SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete Items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Number</p> <p>Mr. Omar Vance 99 N. Main Street Peebles, OH 45660</p>		<p>B. Received by (Printed Name) Omar Vance</p> <p>C. Date of Delivery 12-11-18</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0000 8533 7341</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	